

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): 10/2/2019
2. Deadline for first request for production of documents and first request for interrogatories: 10/17/2019
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) 0 ; defendant(s) 0
3. Date for completion of any joinder of additional parties and amendment of the pleadings: 11/15/2019
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) 1 ; defendant(s) 0
4. Number of depositions by plaintiff(s) of: parties 3 ; non-parties 1
5. Number of depositions by defendant(s) of: parties 1 ; non-parties 1-3
6. Date of status conference (joint status report due two business days in advance): 1/16/2020
7. Date for completion of factual discovery: 1/10/2020
8. Are expert witnesses needed? Possibly; Parties reserve rights
- 8(a). Number of expert witnesses, if any, of plaintiff(s): medical 0 ; non-medical 1
- 8(b). Date for completion of those expert reports: 1/31/2020
- 8(c). Number of expert witnesses, if any, of defendant(s): medical 0 ; non-medical 1-2
- 8(d). Date for completion of those expert reports: 2/14/2020
9. Date for completion of expert discovery: 2/28/2020
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): Within 60 days of decision on summary judgment motion(s), provided such motion(s) do not dispose of case
11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: Summary judgment
60 days of completion of all discovery

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions: Summary judgment; within 60 days of completion of all discovery
13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.) Yes X No
14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.) Yes No X
15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.) Yes No X